

TO: District of Columbia Zoning Commission

FROM: *JLS* Stephen Cochran, Zoning & Special Projects Planner
Jennifer Steingasser, Deputy Director- Development Review, Historic Preservation and Urban Design

DATE: May 15, 2022

SUBJECT: Preliminary Report on Zoning Commission Case No.23-08 – Preliminary and Consolidated Planned Unit Development and Campus Plan for Wesley Theological Seminary at 4500 Massachusetts Ave., N.W.

I. RECOMMENDATION

The Office of Planning (OP) recommends the Zoning Commission set this case down for a public hearing.

OP has considered this application in parallel with the still-open campus plan application Z.C. 22-13 and incorporated information from that case into the analysis of this application. When the balance among benefits, impacts, requested flexibility and the proposed Conditions of Z.C. 23-08 are considered in tandem with this PUD application, the application:

- Is not inconsistent with the Comprehensive Plan, as viewed through a racial equity lens;
- Meets the criteria for setting down a Preliminary PUD for a hearing, particularly when considered with the information provided in Z.C. 22-13;
- Meets the criteria for setting down a Consolidated PUD for a hearing, while also considering relevant information from Z.C. 22-13, but still requiring the submission of additional information prior to the hearing;

Although the information and analysis provided by the applicant for the proposed PUD (case 23-08) is sufficient for setdown, the unusual nature of the parallel consideration of two applications will require the applicant to better incorporate information provided for the campus plan (case 22-13) into the record for the PUD case, both prior to the public meeting and prior to the setdown. This is discussed further in the next section of this report.

II. APPLICATION BACKGROUND, SUMMARY AND ADDITIONAL INFORMATION NEEDED

The application is for 1st Stage and partial Consolidated Planned Unit Development (PUD) that will implement the campus plan case 22-13, for the Wesley Theological Seminary (“Wesley”, or “the Seminary”). This is Wesley’s first PUD and second campus plan.

Minor differences notwithstanding, the PUD proposes essentially the same physical development and uses on the campus as proposed in the pending campus plan. That campus plan application has had public hearings and has been extensively discussed by the Commission. The Commission deferred taking action on the campus plan to allow the applicant time to file a PUD to address the issue of the dormitory operation and use. The case remains active.

The principal component of the PUD and the campus plan is the construction of a new dormitory that would be used by

- students enrolled at Wesley and their immediate families, and,
- by non-Wesley students enrolled at one specific educational institution – American University.

Ground on the campus would be leased for 99 years to a developer specializing in the construction and operation of dormitories for educational institutions. The developer would provide an initial lump sum payment to Wesley and annual ground rent, presumably from monies generated by the rental of beds in the dorm. The rental income received by Wesley would be used to support Wesley’s educational mission and to maintain the portion of the campus not leased to the dorm operator.

The Commission had two primary concerns with the Z.C. 22-13 campus plan:

1. Would the arrangements for the ground leasing and the construction and operation of the dorm as a revenue-source for Wesley be consistent with the campus plan regulations in 11DCMR Subtitle X §101.4; i.e., because the majority of the proposed dormitory would be occupied by students who were not enrolled at Wesley; would that component of the campus plan create a general commercial activity or development that was unrelated to the educational mission of the applicant? (OP notes that the Zoning Administrator determined that the building would be a dormitory).
2. How would Inclusionary Zoning be applied to the dormitory?

In hearings on the campus plan (case 22-13), the applicant stated in response to the first concern, that:

- Because the dormitory was on the Wesley campus and the terms of the ground lease restricted the use to only Wesley or American University students or their immediate families, those parameters meant the dormitory was not a *general* commercial activity; and that;
- Even if it were considered a general commercial activity, such an activity was directly related to the educational mission of applicant Wesley, because proceeds from the ground lease would be used solely to support Wesley’s educational mission.

In response to the second concern, the applicant stated that it would comply with Inclusionary Zoning regulations and if these are determined to not apply to the dormitory, the applicant would comply with them voluntarily.

The Commission remained concerned about the application's compliance with X §101.4 and suggested that the PUD process might provide a better mechanism for implementation of the dormitory as part of a campus plan with these complexities. The present application is the result of that suggestion and should be considered in parallel with the campus plan case 22-13.

If the application is set down, the following additional information, much of which was previously provided in Z.C. 22-13, should be incorporated in the present application:

- An explanation of the relationship between this application and the ongoing campus plan case No. 22-13, particularly the status of the Conditions to which the applicant had agreed in ZC 22-13;
- Discussion of how the PUD would be an integral part of Wesley's educational mission;
- Clarification of the 1st Stage and Consolidated PUD boundaries, particularly with respect to the timing of the demolition of The Old President's House. That house appears to be within the boundaries of the 1st Stage PUD but its demolition is proposed as part of the Consolidated PUD;
- A zoning compliance table;
- Specification of the amount of square footage in the Consolidated PUD dormitory that would be reserved for Inclusionary Zoning and how that space would be configured. For instance, would the IZ space be allocated to individual bedrooms, or would entire living units be reserved as IZ units?
- Clarification of the selection and certification process for students and immediate family members occupying the IZ units, and the different responsibilities of Landmark Properties, Wesley, the Department of Housing and Community Development (DHCD)
- An estimate of the contribution to the Affordable Housing Trust Fund that would be generated by the habitable penthouse space, or the location of the additional affordable dormitory space that would be reserved for students or households earning no more than 50% of the Area Median Income (AMI).
- An updated Transportation Demand Management Plan and clarification of when individual components would be implemented.
- Discussion of the architecture of the PUD particularly including additional, detailed illustrations of the Consolidated PUD facades and materials, and, similar to those

provided for Z.C. 22-13, depictions of it in the context of both the campus and the neighborhood;

- Clarification of which additional landscaping would be provided as part of the Consolidated PUD and which would be provided under the Stage 1 PUD.;
- Clarifications of certain square footages, as noted in this report;
- An update of the Conditions that the applicant proposes to accompany an approval of the PUD case 23-08, presumably based on those to which the applicant had agreed in the campus plan case 22-13.

III. PROPOSAL

A. Overview of Application

The intent of the proposed PUD/campus plan is to enhance Wesley's ability to continue providing Master's and Doctoral-level education for graduate-level students studying theology and related subjects. The 8.7-acre campus would remain a compact cluster of buildings, relatively well-screened from adjacent residential areas and with a publicly accessible green periphery on three sides. Three existing buildings and a parking lot would be demolished. A new 219-unit, 659-bed dormitory and underground parking lot would be constructed on the site of two of the demolished buildings, and a new faculty/administration/ mechanical support building would be constructed near the site of the third.

The site is zoned RA-1, which is intended for low to moderate density residential uses, but in which educational uses are also permitted. The plan for the campus' development would be considered and developed as a Consolidated PUD and a First Stage PUD. While the cap on student enrollment would remain the same (715) as under the current campus plan, there would be net increase of 563 beds and 220 parking spaces. Traffic circulation would be similar to the existing pattern, but with a new prohibition on passenger vehicles exiting onto University Avenue. The upgraded campus would be more sustainable, with new and renovated buildings being certified at a LEED Gold level.

The 1st Stage PUD comprises Square 1600, A& T Lots 818, 7,8 and 9. It incorporates all but one of the existing buildings that are to be retained, as well as one new administration building, and all of the campus' open space. New construction under the 1st stage PUD would be limited to a two-story faculty/administration/maintenance building that would include some mechanical support space for the overall campus, and a neighborhood playground near the site of a to-be-demolished building known as the "Old President's House".

The Consolidated PUD would encompass only Square 1600, Lot 819 – an approximately 113,785 SF site at the southeast corner of campus, adjacent to The American University. That lot would be leased for 99 years to a private company, which would construct and operate a new seven-story / 659-bed dormitory to be occupied by students from Wesley and from the adjacent American University, as well as immediate family members of the resident students. The

building would also have an underground garage for 363 vehicles, replacing an existing surface parking lot. Payments from the lease and dorm-room rental would be used to support the Seminary's ongoing programs.

The applicant proposes to construct the Consolidated PUD within the next two years. The preliminary PUD would be phased in over 10 years.

Table 1	Comparison of Existing and Proposed Development	
Proposal	2022-2032 Wesley Theological Seminary Campus Master Plan	
Location	Washington Theological Seminary 4500 Massachusetts Ave. N.W.	
Legal	Square 1600; Lots 6 (A&T Lots 818, 819), 7, 8 and 9	
ANC	Ward 3, ANC-3E (formerly ANC 3D)	
Zoning	RA-1. No map amendment requested.	
Site	381,788 SF (8.78 acres)	
Buildings	Existing: 11, including maintenance facilities, with 166,916 SF	Proposed: demolish 4 plus surface parking lot; construct 2 new buildings and underground parking garage
FAR	Zone Permits: 1.8 (687,216 SF) w/ IZ; 1.08 for PUD w/out IZ	Campus Plan Permits: 0.64 (245,000SF)
	Existing: 0.55 (210,000 SF)	Proposed 1.07 FAR (417,203 SF)
Max. Height	Existing: 25'-40' in 2-4 stories (excluding chapel tower)	
	Proposed: Consolidated PUD Dorm at 75'8" (7 stories). 1 st Stage PUD at 25'- 40' (2 - 4 stories) (excluding existing Chapel tower)	
Beds	Campus Plan Permits: 172 (87 non-Wesley graduate students among 3 dormitories)	Proposed: 735 under full PUD (including ~600 AU students & immediate families in Consolidated PUD's new dorm only, and none in remaining 2014 dorm)
	Existing: 166	
Enrollment & FTE's	Campus Plan Permits: 715 FTE's	Proposed: 705 total for full-time or part-time enrolled students taking courses on campus under full PUD.
	Existing: Less than cap.	
Faculty	Campus Plan Permits: no more than 110	Proposed: No more than 100 faculty & other staff under full PUD plus no more than 12 non-Wesley personnel hired by Landmark for proposed ground-leased dormitory under Consolidated PUD
	Existing: 31 full-time faculty and 69 others, including part-time faculty total faculty and full and part-time staff	
Other Staff	Campus Plan Permits: See above	Proposed: See above
	Existing: See above	
Parking	Campus Plan Requires: at least 150	Proposed: 363 in Consolidated PUD garage, with 105 reserved for Wesley, plus 31 remaining spaces on 1 st Stage PUD internal roads. Total = 394 spaces
	Existing: 174 (143 in lot; 31 on internal roads)	
Open Space Buffer	Campus Plan Requires: at least 170 feet between University Ave and dorm constructed in 2014. Existing: Same as above	Proposed: Under Stage 1 PUD, further landscape the 55% (210,000 SF) of the campus that is open space. 1 st Stage PUD's new 2-story faculty /administrative/

		maintenance building would be 105 feet from University Avenue.
Zoning Flexibility		Proposed PUD: relief from height-related setback requirements from property line for portion of Consolidated PUD

B. Existing Campus

The area covered by the proposal is the Seminary's sole campus, other than lease space near Mount Vernon Square. The 8.77-acre site in northwest Washington is essentially diamond-shaped and bounded by Massachusetts Avenue on the northeast, University Avenue on the northwest, and The American University's (AU's) main campus on the southeast and southwest. A portion of the southeastern corner is less deep from north to south than the rest of the campus.

AU's high-rise dormitories and playing fields are adjacent to the southeastern and southwestern sides of the Seminary's campus. There are single-family houses to the northeast, across and well set-back from Massachusetts Avenue. The more proximate residential area is a single-family detached neighborhood on the campus' northwestern side, down-hill and across University Avenue from the campus' existing and proposed buildings.

The Wesley campus was constructed in 1958-59. Since then, one new building has been constructed, under the campus plan approved in ZC 05-40. The built portion of the campus comprises two back-to-back areas at the top of the hill and two buildings on the hill's slope. Towards Massachusetts Avenue is a landscaped pedestrian quadrangle with surrounding buildings devoted to classroom, administrative, chapel and library uses. The quadrangle's buildings would remain under the proposed plan.

West of the quadrangle the 3-story Carrol Hall and Straughn Hall dormitories form an inverted "L" bordering a 143-space surface parking lot, which is also bordered by the back of the library. Straughn and Carroll Halls and the parking lot would be demolished under the proposal to make room for the Consolidated PUD's seven-story dormitory and underground parking garage.

On the slope facing University Avenue is the "New (2014) Residence Hall", located to the north of and behind Straughn Hall. This is the only building constructed under the existing campus plan and would remain under the current proposal. Further down the hill, towards University Avenue is the "Old President's House", which would be demolished under the proposed plan.

With the exception of one former residential building slated for demolition campus buildings are set back at least 170 feet from University Avenue, with most clustered towards the south, adjacent to AU and atop a wooded hill that slopes down to the single-family homes across University Avenue, and also down towards Massachusetts Avenue. This enables there to be a significant landscaped buffer between the campus buildings and nearby residences.

The 1 site has access points from both Massachusetts Avenue and University Avenue, with the former being used primarily for auto ingress and egress (right turn only) and the latter for loading

and delivery. It is located approximately ½ mile from the Tenleytown-AU Metro Station and is served by 4 bus lines along Massachusetts Avenue and two along Nebraska Avenue, to the south.

C. Overall PUD/Campus Plan Proposal

The existing campus is illustrated below in Figure 1 and the proposed PUD/campus plan is shown in Figure 2.

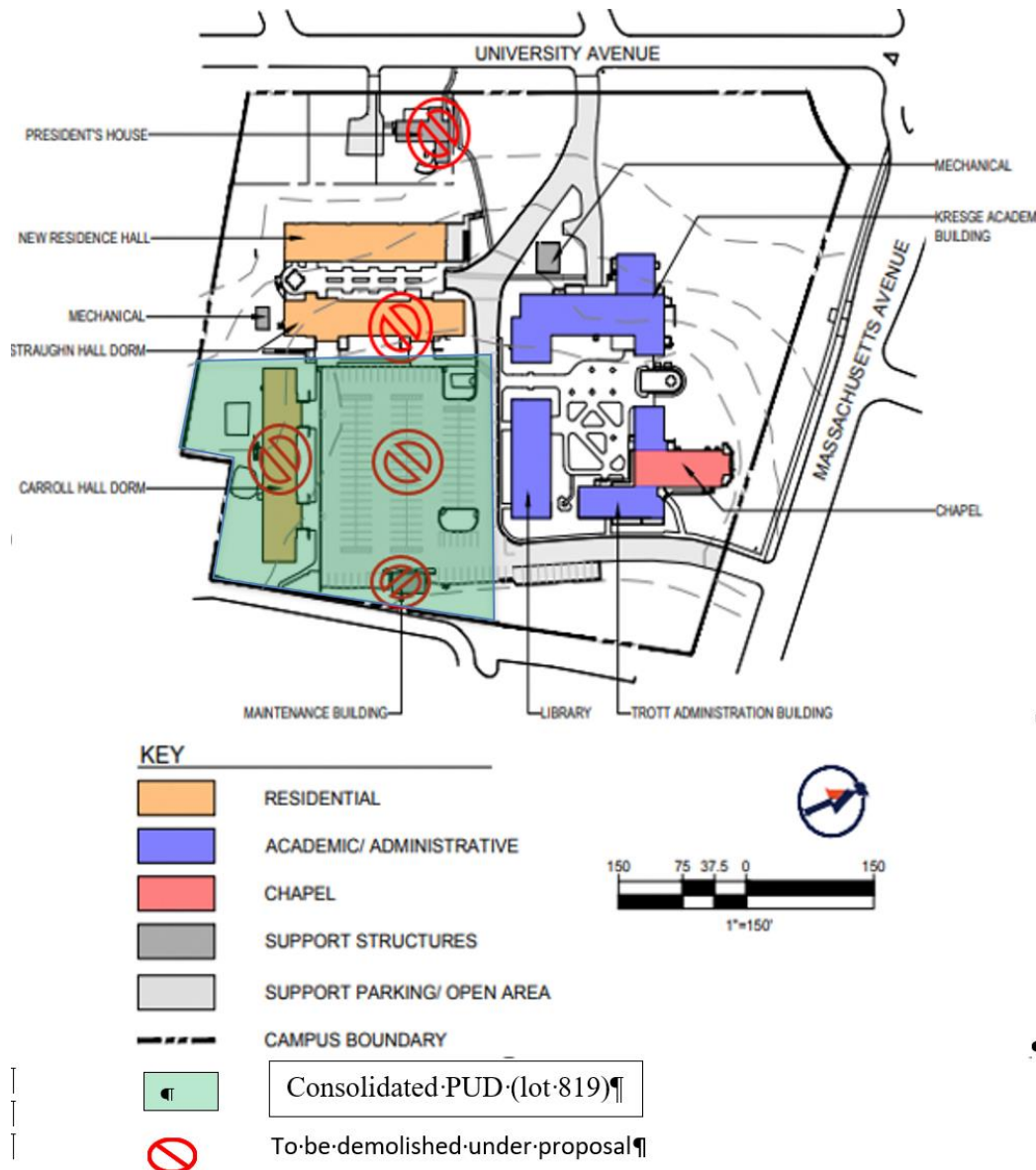


Figure 1. Preliminary & Consolidated PUD Boundaries and Proposed Demolition The Consolidated PUD is shaded in green. The Preliminary PUD is the Area within Campus Boundary, minus the Consolidated PUD.

The existing campus' boundaries would comprise the overall PUD. On both illustrations the Consolidated PUD approximate area is shaded in green and the Preliminary PUD consists of the rest of the existing campus. Figure 1 shows the boundaries of the proposed Preliminary and

Consolidated PUDs, and labels the buildings and other improvements proposed for demolition under the overall PUD application.

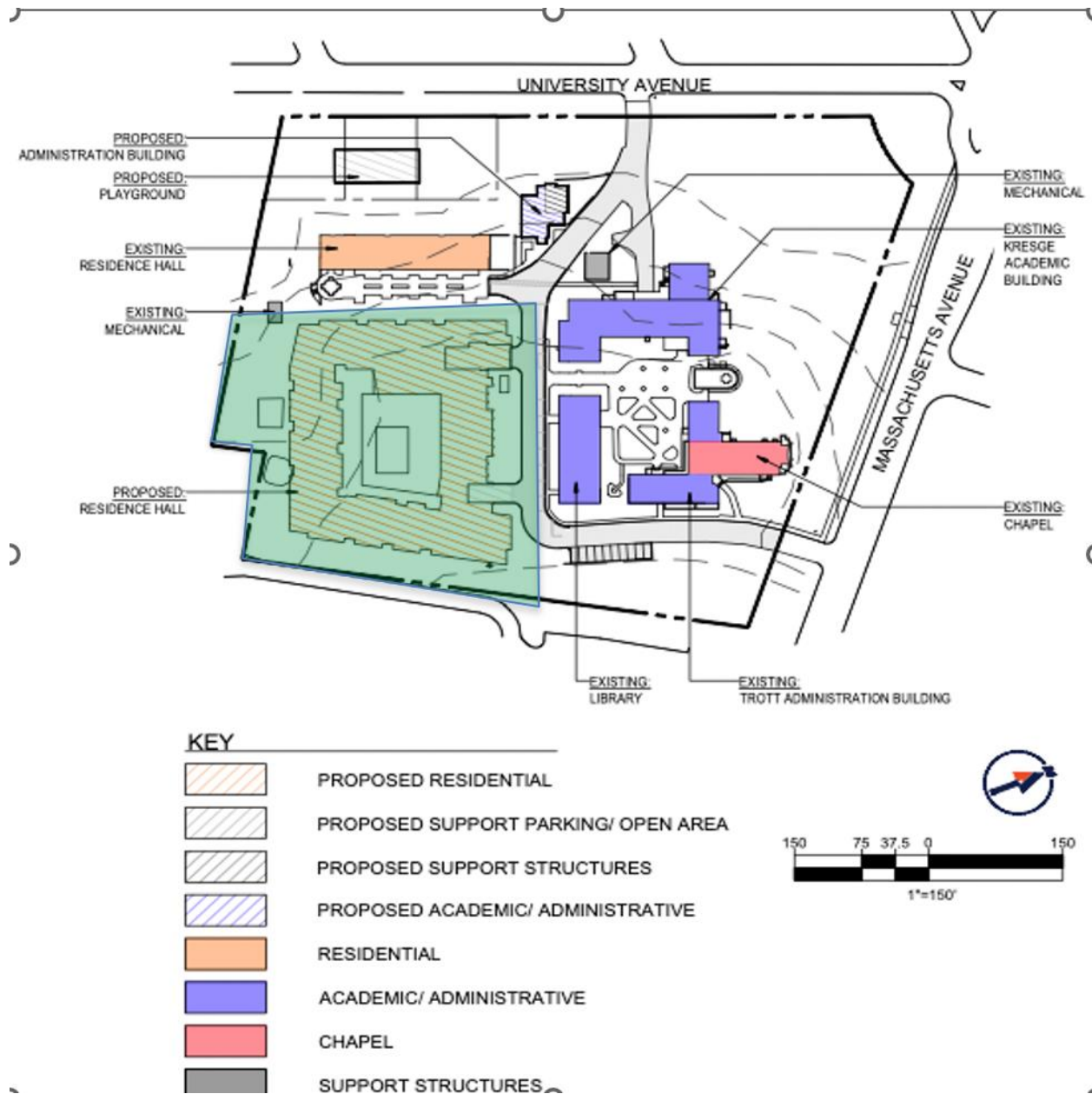


Figure 2. Proposed Consolidated and Preliminary PUD After Completion

Table 1 compares what was approved for development by the existing campus plan, what would be permitted under the RA-1 zone, what is actually built on the campus, and what the applicant is proposing under the PUD. These numbers are subject to minor clarification after setdown.

Table 1	Comparison of Existing Campus and Proposed PUD Development, With Reference to Zone and Current Campus Plan Permissions	
Proposal	2022-2032 Wesley Theological Seminary Campus Master Plan	
Location	Washington Theological Seminary 4500 Massachusetts Ave. N.W.	
Legal	Square 1600; Lots 6 (A&T Lots 818, 819), 7, 8 and 9	
ANC	Ward 3, ANC-3E (formerly ANC 3D)	
Zoning	RA-1. No map amendment requested.	
Site	381,787 SF (8.77 acres)	
Buildings	Existing: 11, including maintenance facilities	Proposed: demolish 4 plus surface parking lot; construct 2 new buildings and underground parking garage
FAR	Zone Permits: <ul style="list-style-type: none"> - 0.9 s MOR w/out IZ = - 1.08 with IZ 20% bonus - 1.296 with IZ 20% bonus + PUD 20% bonus = 494,796SF 	Campus Plan Permits: 0.64 (245,000SF)
	Existing: 0.55 (210,000 SF)	Proposed PUD: 1.07 FAR (417,203 SF) ¹
Max. Height	Existing: 25'-40' in 2-4 stories (excluding chapel tower)	
	Proposed PUD: one @75'8" (7 stories) rest @ 25'- 40' (2 - 4 stories) (excluding tower). Permitted by zone if set-back 1:1 from all boundaries. Setback relief sought from part of one boundary,	
Beds	Campus Plan Permits: 172 (87 non-Wesley graduate students among 3 dormitories)	Proposed: 735 under full PUD (including ~600 AU students & immediate families in Consolidated PUD's new dorm only, and none in remaining 2014 dorm)
	Existing: 166	
Enrollment & FTE's	Campus Plan Permits: 715 FTE's	Proposed: 705 total for full-time or part-time enrolled students taking courses on campus under full PUD.
	Existing: Less than cap. See Exhibit 12 B for details.	
Faculty	Campus Plan Permits: no more than 110	Proposed: No more than 100 faculty & other staff under full PUD plus no more than 12 non-Wesley personnel hired by Landmark for proposed ground-leased dormitory under Consolidated PUD
	Existing: 31 full-time faculty and 69 others, including part-time faculty total faculty and full and part-time staff	
Other Staff	Campus Plan Permits: See above	Proposed: See above
	Existing: See above	
Parking	Campus Plan Requires: at least 150	Proposed: 363 in Consolidated PUD garage, plus 31 on 1 st Stage PUD internal roads =394 spaces). ~ 105 reserved for Wesley students and staff.
	Existing: 174 (143 in lot; 31 on internal roads)	
Open Space Buffer	Campus Plan Requires: at least 170 feet between University Ave and dorm constructed in 2014.	Proposed: Retain existing buffer distances and further landscape the 55% of the campus that is open space. 1 st Stage PUD's

¹ Minor discrepancies among the total PUD square footage listed in different parts of the application will need clarification. The applicant should also verify that the figure for "unused campus GFA in Exhibit 3A3, p. 5 is correct.

Table 1	Comparison of Existing Campus and Proposed PUD Development, With Reference to Zone and Current Campus Plan Permissions	
	Existing: Same as above	new 2-story faculty / administrative/ maintenance building would be 105 feet from University Avenue.
Zoning Flexibility		Proposed PUD: relief from height-related setback requirements from property line for portion of Consolidated PUD

Table 2 compares the existing and proposed buildings' dimensions and uses, whether they would be retained or demolished, and any new construction.

Table 2. Wesley Theological Seminary PUD/Campus Existing and Proposed Buildings						
Total Campus and PUD Site Area: 381,878 SF						
BUILDING	Use	EXISTING SF	PROPOSED SF	EXISTING (PROPOSED	PUD PHASE
Straughn Hall	Existing Dormitory	29,866	(28,866)	45 beds	-45 beds	Demolish, Consolidated.
Carroll Hall	Existing Dormitory	27,533	(27,533)	45 beds	-45 beds	Demolish, Consolidated.
Surface parking lot	Existing parking	174 spaces total	0			Demolish 143 spaces, Consolidated
Small Maintenance Bldg.	Existing mechanicals	Not provided	0			Demolish, Consolidated
Proposed New Dorm	Proposed Dormitory	0	306, 957		+659 beds	Build, Consolidated
Proposed Under-ground Garage	Proposed Parking				363 spaces	Build, Consolidated
Old President House²	Existing Storage	4,538	(4,538)	--	--	Demolish, Consolidated PUD³,)
Library	Existing Academic	16,630	16,630	--	--	Retain, Stage 1

² Old Presidents House is proposed for demolition in Consolidated PUD phase but appears to be within 1st Stage PUD boundaries.

³ Ibid.

BUILDING	Use	EXISTING SF	PROPOSED SF	EXISTING (PROPOSED	PUD PHASE
Trott Hall / Chapel	Academic/ Religious	26,195	29,195	--	--	Retain, Stage 1
Kresge Hall	Existing Academic	32,819	32,819	--	--	Retain, Stage 1
“New” (2014) Residence Hall	Existing Dormitory	29,195	29,195	76	Keep 76 beds	Retain, Stage 1
Proposed Faculty/Ad- min./Main- tenance Building.	Proposed Admin.	--	5267	--	--	Build, Stage 1.
Total SF / # beds		166,916	417,201⁴	166	735	
FAR (RA-1 permits 1.8)		0.44	1.07			

When the full PUD is completed, there would be a new 659 bed LEED Mid-Rise Residential Gold certified dormitory with a 363-space underground parking garage, and a new LEED New Construction Gold-certified administrative and mechanical support building. The Transportation Demand Management Plan is proposed to be essentially the same as what the District Department of Transportation (DDOT) approved during the Z.C. 22-13 review, subject to additional review by DDOT for this application. 31 surface parking spaces would be retained and passenger vehicle exits onto University Avenue would be newly prohibited. There would also be a new playground that would be accessible for the use of the nearby residential neighborhood.

D. Consolidated PUD

The Consolidated PUD would involve the demolition of the 90-bed Straughn and Carroll dormitories, the parking lot between them involve, and small mechanicals building . The new dormitory would be constructed on the site of the demolished dormitories, parking lot and mechanical building.

The applicant’s statement indicates that the Old President’s House would also be demolished as part of the Consolidated PUD. However, that building is at a distance from what are, presumably, the Consolidated PUD’s boundaries. Clarification of boundaries and timing is needed before a public hearing.

The Consolidated PUD’s new dormitory would be 299,244 square foot in floor area and have seven stories in 74 feet, 8 inches tall plus a habitable penthouse. The top two stories are set back

⁴ Minor discrepancies among the total square footage listed in different parts of the application will need clarification.

27.5 feet and 32.5 feet farther from University Avenue than was proposed in the campus plan case 22-13.

The dormitory would be privately developed and managed. Landmark Properties would be given a 99-year ground lease for Lot 819, and would construct, operate and maintain the building. Wesley would receive an initial lump sum payment from Landmark and annual ground rent, which would be used to support Wesley's ongoing educational mission, the PUD-related improvements to the Seminary's grounds and the playground public benefit.

The 215 living units will be configured into 21 studios, 41 one-bedrooms, 42 two-bedrooms, 4 three-bedrooms, 55 four-bedrooms and 52 five-bedrooms for a total of 659 beds for students or their immediate families. Each unit would have a common living space and a kitchen. Landmark Properties would reserve the square footage required by the Inclusionary Zoning regulations for income-eligible Wesley and AU students and their immediate families.

Parking and loading facilities for the Consolidated PUD would be inside the proposed dormitory and would be accessed only from Massachusetts Avenue. Automobiles could exit only via a right turn onto Massachusetts Avenue. Trucks would be permitted to exit via Massachusetts Avenue or, on a limited basis, from University Avenue. Both delivery vehicle exits would be limited to right turns. The parking spaces in the Consolidated PUD, as well as the 31 surface parking spaces would be open for use by both the Consolidated and 1st Stage portions of the PUD.

The proposed dormitory would be partially visible from surrounding streets, particularly to the northwest. However, the Consolidated PUD dorm would be 300 feet from the property line at University Avenue, and farther to the residences nearest that street. The distance from the dorm to residences across Massachusetts Avenue would be at least 600 feet. Given the existing, taller, dormitories on the AU campus near the border of the applicant's property, views of larger buildings from the surrounding residential areas are not unprecedented.

As with the campus plan case 22-13, additional color illustrations of the proposed dormitory from Massachusetts Avenue and from the neighborhood northeast of University Avenue are needed prior to the hearing. The additional material should also note whether additional landscaping to buffer the view of the new dormitory would be added as part of the Consolidated PUD or would be phased in later as part of the First Stage PUD.

IZ and Affordable Housing

The applicant proposes to provide 53-66 IZ beds in the Consolidated PUD dorm. Because Subtitle C § 1001.6 (c) exempts housing developed by or on behalf of a local college or university for its students, faculty or staff from IZ requirements, the number of required IZ beds would be linked to the number of AU students and their immediate family members residing in the Consolidated PUD dorm. The applicant estimates that at least 1,300 AU students would be eligible for IZ units (Exhibit 3A3 p. 15).

Additional IZ and affordable housing information will be required by the hearing, including:

- The approximate number of Wesley students and immediate family members estimated to reside in the dorm.
- The estimated number of beds that would be available for AU students and their immediate families.
- The approximate location of the proposed IZ beds and whether they would be grouped into discrete IZ living units or distributed among all living units.

Information is also needed about the amount of habitable penthouse space and how its affordable housing requirements would be met.

Benefits and Amenities

The applicant states that the provision of on-campus housing for Wesley students and near-campus housing for AU students would increase the supply of off-campus housing for non-students and make that housing more available and affordable. (Exhibit 3A3, page 15). This would seem to be an indirect public benefit.

To the extent that new TDM measures are begun when the Consolidated PUD is completed, these may be able to be considered as both mitigation and as a public benefit.

Zoning Flexibility for Consolidated PUD

Limited Height Relief. Subtitle F § 203.3. An institutional building – in this instance the proposed new dormitory – may be erected to as much as 90 feet (plus penthouse and roof structure) if the building is removed from all lot lines by at least 1 foot for every foot of height authorized by-right in the zone district. The RA-1 zone permits 40 feet by-right. The new dormitory would be 74’ 8” high, thereby requiring at least a 35-foot setback from all lot lines. The proposed building would be set back at least this distance from all lot lines, with the exception of an irregular section at the campus’ southeastern border, adjacent to American University. In this section the proposed setback is only 27 feet from the lot line. The applicant therefore requests an area variance from the height restriction of Subtitle F § 203.3. The applicant posits the following justification for the relief:

- Exceptional Condition: The “notch” in the property line is anomalous to the otherwise straight-line boundaries of the campus.
- Practical Difficulty: The location of existing buildings and circulation roads and paths, and the need to retain them, as well as a Heritage tree, restricts the ability of the applicant to move the building farther from the “notched” portion of the property line.
- No Detriment to Public Good or Zone Plan: Relief from the requirement would enable the building to be located at the farthest possible distance from the residential neighborhood and closer to the taller existing AU dormitories, thereby minimizing the potential impact of the building on surrounding properties.

OP does not object to the requested relief.

E. First Stage PUD

The 1st Stage PUD would involve the construction of a new 5,267 square foot two-story building for faculty, administration and some mechanical support space. The floor plan and context illustration for that building is in Exhibit 3G3 as well as the renderings of the building's façade on page 10 of Exhibit 3G2 are sufficient for a Stage 1 PUD.

A new neighborhood-focused playground close to University Avenue would also be constructed during this phase, if it had not already been constructed as part of the public benefits of the Consolidated PUD. The playground would be near the site of The Old President's House.

Automobile access and parking would be the same as for the Consolidated PUD, with parking being available both within the Consolidated PUD and on surface parking spaces. Truck and other service-deliveries would use loading docks at the existing Kresge Building and 2014 Dorm. Delivery access and exiting for the 1st Stage PUD would be from University Avenue, with limitations specified in the TDMP.

The existing landscaped buffers along Massachusetts Avenue and University Avenue would be retained and enhanced, with 55% of the site's area remaining undeveloped. The applicant states that there is no plan to develop the three former residential Lots 7,8 and 9 with anything other than the proposed playground. This is supported by the Landscaped Plans in Exhibit 3G2. Pages 4-8. However, the applicant should clarify which parts of the landscape plans would be clarified under the Consolidated PUD, and which under the Stage 1 PUD.

Zoning Flexibility for 1st Stage PUD

Development Timeline Limits: The applicant requests flexibility from Subtitle Z § 702.1's one-year limitation on the approval period for a first-stage PUD's approval, unless otherwise approved by the Commission at the time of the PUD's approval. The applicant requests a 10-year period to phase in the improvements planned for the 1st Stage PUD.

OP has no objection to the requested relief, provide the applicant clarifies whether certain improvements would be implemented under the Consolidated PUD or the 1st Stage PUD. These include, in particular,

- Demolition of The Old President's House
- Construction of the proposed playground
- Implementation of the transportation demand management plan
- Provision of the additional campus-wide landscaping.

Benefits and Amenities

The applicant considers certain TDM measures as well as the installation of \$80,000 of public improvements requested by the ANC and DDOT to be public benefits. These include a sidewalk along the eastern side of University Avenue, ADA-related signage, crosswalks and curb ramps at University Avenue and Sedgwich Street. (See Exhibit 3A3, page 16).

In addition to the above, the Seminary has agreed to forgo development of three lots along University Avenue and construct a community-accessible playgrounds in that area. In addition to the playground, the applicant notes that Wesley would forego an estimated \$4.5 million from the potential sale of the lots for single-family house development.

As with the 1st Stage PUD, certain proposed TDM circulation restrictions are noted as community benefits.

Finally, the applicant estimates the proposed PUD, particularly the land within the Stage 1 PUD, could accommodate an additional 278,000 square feet of “campus authorized gross floor area [that] will not be built by Wesley Seminary”. (Exhibit 3A3, page 17). OP has asked the applicant to clarify the derivation of the figure.

F. Balance of Requested Zoning Flexibility and Requested Relief

The PUD proposal would limit the campus development to 0.01 less FAR than could be achieved on the site by a potential matter or right development that includes IZ. The only flexibility being requested is permission to set the Consolidated PUD building 8 feet less far from one portion of the property line than would otherwise be required to achieve its proposed height by-right.

The PUD would reserve 55% of the campus as open space that has traditionally been open to the community, provide access to a new playground, and provide new sidewalks and other public space measures that would benefit the public.

The potential benefits of the PUD appear to be commensurate with the limited relief being requested.

IV. COMPREHENSIVE PLAN ANALYSIS

In general, the proposed Consolidated PUD and the Preliminary PUD would be not inconsistent with the Comprehensive Plan, including when the proposal and the plan are viewed through a racial equity lens.

A. Comprehensive Plan Maps

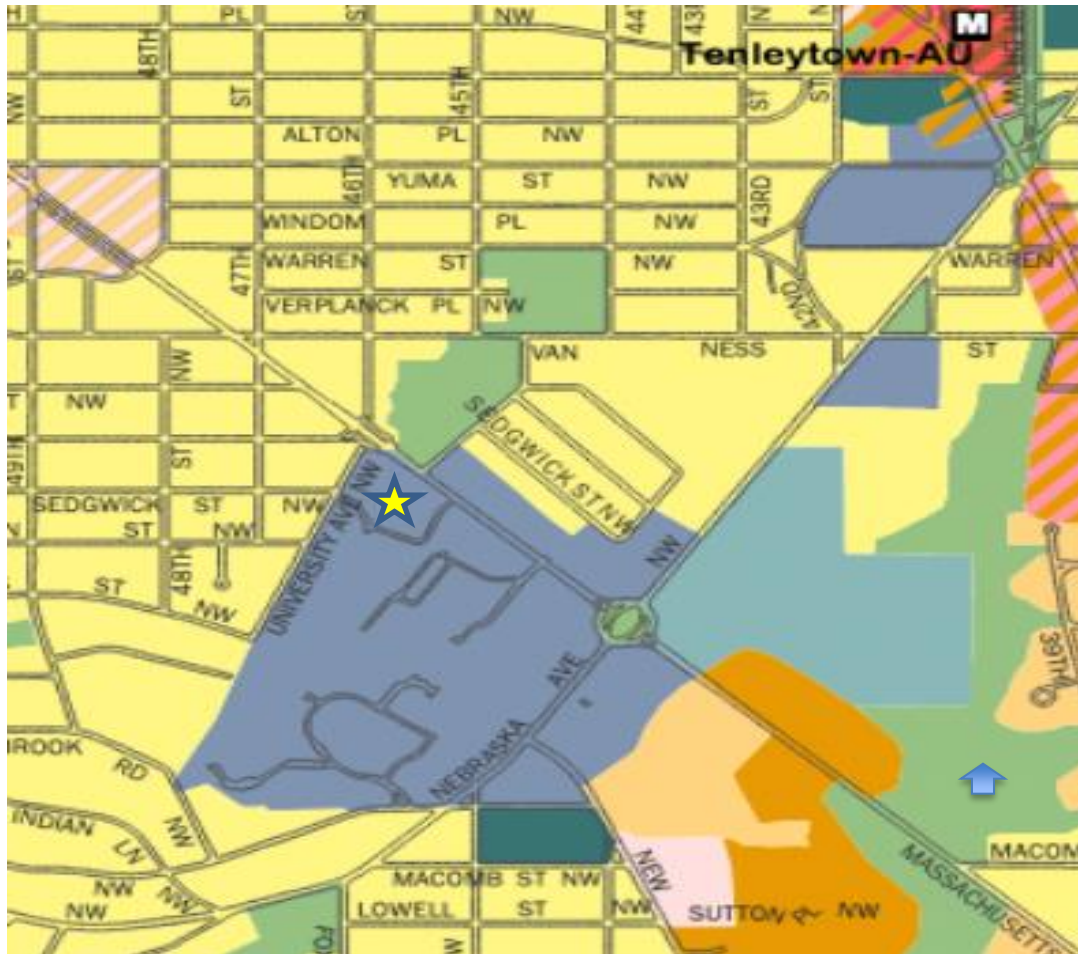


Figure 31. Generalized Future Land Use Map (FLUM)

The yellow Star indicates the Wesley campus and proposed PUD site. The FLUM designation is Institutional (purple), as is the American University's designation to the south and the east. Low density residential (yellow) is to the northwest and northeast.

The development proposed under the PUD would be institutional use buildings on a campus of higher learning and would not be available for occupancy by the general public.



Figure 2. Generalized Policy Map. (FLUM)

The yellow Star indicates Wesley campus site. The Policy Map designation is Institutional (purple), as is the American University's designation to the south and the east. The residential areas are designated for neighborhood conservation. The proposed PUD/Campus plan would be entirely within the boundaries of Wesley's existing institutional campus. While there may be some visual impact on the neighborhood across University Avenue from the proposed 75-foot high Consolidated PUD dormitory during winter months, the illustrations previously provided by the applicant in ZC 22-13 indicate the impact should not be substantial.

The addition of additional resident students on the site would also result in some increase in traffic due to the increased capacity of the proposed new garage and the larger dorm facility's need for deliveries. However, the applicant and DDOT had agreed to a Transportation Demand Management Plan in ZC 22-13 that mitigated any potentially substantial impact on the surrounding neighborhoods. A similar plan would be employed for this PUD, thereby helping to conserve the integrity and ambience of the existing neighborhood.

B. CityWide Elements

a. Land Use Element

Policy LU-2.3.5: Institutional Uses

Recognize the importance of institutional uses, such as private schools, childcare facilities, hospitals, churches, and similar uses, to the economy, character, history, livability, and future of Washington, DC and its residents. Ensure that when such uses are permitted in residential neighborhoods, their design and operation is sensitive to neighborhood issues and neighbors' quality of life. Encourage institutions and neighborhoods to work proactively to address issues, such as transportation and parking, hours of operation, outside use of facilities, and facility expansion. 312.7

Policy LU-3.3.1: Transportation Impacts of Institutional Uses

Support ongoing efforts by institutions to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, public transportation, shuttle service and bicycling; providing on-site parking; and undertaking other transportation demand management measures. 317.7

Policy LU-3.3.3: Nonprofits, Private Schools and Service Organizations

Plan, design, and manage large nonprofits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas in a way that minimizes objectionable impacts on adjacent communities. Expansion of these areas should not be permitted if the quality of life in adjacent residential areas is significantly adversely impacted. 317.9

Policy LU-2.1.11: Residential Parking Requirements

Parking requirements for residential buildings should respond to the varying levels of demand associated with different unit types, unit sizes, unit locations (including proximity to transit), and emerging transportation trends and new technology (such as the sharing economy and autonomous vehicles (AVs)). Parking should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. Reductions in parking may be considered where transportation-demand management measures are implemented and a reduction in demand can be demonstrated. 310.18

The overall PUD would be not inconsistent with the Land Use Element of the Comprehensive Plan. During their planning process, the Seminary has worked proactively with the neighboring residential community, and has responded by reducing the height initially proposed for the new dormitory and providing additional setbacks for its upper stories. The most recent plan has rotated the upper floors to so that windows will not be facing the adjacent neighborhood, thereby applicant minimizing potential light-spillage issues.

The campus plan includes other measures to minimize potentially objectionable impacts on the adjacent community. Foremost is enhanced landscape buffering along the campus perimeter, clustering new housing as far away from the residential neighborhood as possible, and working with the community to construct a neighborhood-oriented playground adjacent to University Avenue, if desired by the neighborhood.

The Land Use element encourages schools to provide alternative transportation options to mitigate traffic and parking impacts. The proposed measures included in the CTR were reviewed by DDOT in ZC 22-13 and would be further evaluated for this case after setdown.

When viewed through a racial equity lens, the land use proposed for the PUD should not have any negative impact and may have the following positive impacts:

Wesley's mission promotes racial equity. Given the careers led by Seminary graduates and the outreach the Seminary engages in within the District, the retention of the Seminary may also contribute to racial equity. While some of the student body pursue academic careers, most are trained for careers in service to others. In addition to becoming pastors at congregations such as Shiloh Baptist and Metropolitan Baptist, Ebenezer A.M.E., Foundry Methodist and others, seminary graduates serve as leaders in a range of non-profit organizations. The Seminary actively engages its graduates in virtual and in-person training to advance community engagement skills and provides real time assistance to events promoting racial and social justice. It also runs an internship program placing Wesley and other theological students as interns in churches throughout the District.

The revenues that would be generated by the proposed new dormitory would help the Seminary to continue providing these programs that promote racial equity.

Approximately 34% of the Seminary's students are Black. 18% of the administration, 25% of the faculty, and 7% of other staff are Black – the second largest racial or ethnic group in the Rock Creek West planning area. (See Table 3, below). To the extent that current and project Wesley and AU students and their immediate families are or would reside in the District, the proposed expansion of graduate student housing could help to free up residential units containing 569 bedrooms. This should help to marginally relieve demand on the District's housing supply, marginally slow the rate of increase in rental prices. While this may have some positive impact on housing affordability for members of racial and ethnic minority groups, given the demographic profile of the Rock Creek West Planning Area, and the composition of the Wesley student body, faculty and other employees, no one racial or ethnic minority group white people are likely to benefit more than any other racial or ethnic group.

b. Transportation Element

Policy T-1.1.8: Minimize Off-Street Parking

An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged.

403.14

Policy T-5.2.2: Charging Infrastructure

Encourage early deployment of EV charging stations at no charge in appropriate, publicly accessible locations across the District to serve existing neighborhoods.

Consider the integration of EV charging stations in new and existing residential and commercial developments. Consideration should also be given to locations where EV charging stations can be retrofitted into parking garages. As EVs become more popular, there will be increased demand for on-street charging stations, which will need to be balanced with other curbside needs and uses. 430.4

The proposed PUD is not inconsistent with the Transportation Element of the Comprehensive Plan. The plan's transportation improvements promote bicycle, pedestrian, and, seemingly, shuttle bus usage. The plan enhances pedestrian pathways and adds long-term and short-term bicycle parking on campus. It is not clear whether the proposed underground garage would also include electric charging stations.

Policy T-1.1.8 and Policy EDU 3.3.5, encourage the provision of adequate parking on campus. The plan proposes to address both the transportation and the education element by increasing on-campus parking, (although providing it at a decreased student-bed to parking-space ratio than it does now), by de-bundling parking from dorm-room rental, by prohibiting student, faculty and employee parking on residential streets, and by further measures encouraging the use of mass transportation and alternatives to private vehicles.

When viewed through a racial equity lens, the proximity of the Tenleytown-AU Metro station and the access that both public transit and the AU shuttle system provide to the area near the campus would help diminish the need for private-vehicle dependency, thereby ensuring individuals with lower median incomes (see Table 3) would have access to the PUD/campus.

c. Housing Element

Policy H-1.1.9: Housing for Families

Encourage and prioritize the development of family-sized units and/or family-sized housing options which generally have three or more bedrooms, in areas proximate to transit, employment centers, schools, public facilities, and recreation to ensure that the District's most well-resourced locations remain accessible to families, particularly in areas that received increased residential density as a result of underlying changes to the Future Land Use Map. Family-sized units and/or family-sized housing options include housing typologies that can accommodate households of three or more persons and may include a variety of housing types including townhomes, fourplexes and multi-family buildings. To address the mismatch between meeting the needs of larger households and the financial feasibility of developing family-sized housing, support family-sized housing options through production incentives and requirements that address market rate challenges for private development that may include zoning, subsidies or tax strategies, or direct subsidy and regulatory requirements for publicly owned sites. 503.11

Policy H-1.2.1: Low- and Moderate-Income Housing

Production as a Civic Priority The production and preservation of affordable housing for low- and moderate-income households is a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout all District neighborhoods. 504.8

Policy H-1.2.3: Affordable and Mixed-Income Housing

Focus investment strategies and affordable housing programs to distribute mixed-income housing more equitably across the entire District by developing goals and tools for affordable housing and establishing a minimum percent affordable by Planning Area to create housing options in high-cost areas, avoid further concentrations of affordable housing, and meet fair housing requirements. 504.10

d. Environmental Protection Element

The overarching goal for the Environmental Protection Element is to protect, restore, and enhance the natural and human-made environment in Washington, DC, taking steps to improve environmental quality and resilience, adapt to and mitigate climate change, prevent and reduce pollution, improve human health, increase access to clean and renewable energy, conserve the values and functions of Washington, DC's natural resources and ecosystems, and educate the public on ways to secure a sustainable future. 601.1

Policy E-2.1.2 Trees Requirements in New Developments

Use planning, zoning, and building regulations to promote tree retention and planting, as well as the removal and replacement of dying trees when new development occurs. Tree planting and landscaping required as a condition of permit approval should include provisions for ongoing maintenance. 605.6

Policy E-3.2.1: Support for Green Building

Encourage the use of green building methods in new construction and rehabilitation projects and develop green building methods for operation and maintenance activities. 614.2

Policy E-3.2.2 Net-Zero Buildings

Provide incentives for new buildings to meet net-zero energy design standards, as called for in Clean Energy DC and Sustainable DC 2.0. Establish a path to the phased adoption of net-zero codes between 2022 and 2026. The District's building energy codes should be updated again by 2026 to require that all new buildings achieve net-zero energy use or better. Prior to 2026, the District should provide incentives to projects that voluntarily seek to achieve net-zero energy use. 612.4

The proposed campus plan is not inconsistent with the Environmental Protection Element of the Comprehensive Plan. The LEED and Green Area Ratio sustainability information is on page 9 of Exhibit 3G2.

The school's well-maintained and wooded environment is a defining feature of the campus' character. 55% of the campus would remain as open space. Additional trees and other vegetation would be planted under the new plan. (See Landscape Plans, Exhibit 3G2, pages , pages 4 - 8). Additionally, what is now a surface parking lot would be replaced by a new building that would be LEED Gold mid-rise residential and the new faculty/administration/maintenance building

would be LEED Gold new construction. These levels have become standard for new buildings on campuses. The Consolidated PUD plan notes there will be a green roof on the new dormitory, and locations for future solar panels are being explored. Details about these measures will be expected prior to a public hearing.

OP has also encouraged the applicant to consider ways for its new construction and overall operations to get closer to net-zero levels. However, as was noted by DOEE in its review of the campus plan during Z.C. 22-13, it would be difficult to achieve net zero in a campus plan where most of the buildings were constructed in the mid-20th century and are not planned for further renovations.

The proposed buildings would not generate any emissions not typical to residential facilities or small offices. The Department of Energy and Environment (DOEE) reviewed the nearly identical project when reviewing the campus plan in Z.C. 22-13. It had no objections to the final plan for that application. The proposed development on the property would be required to demonstrate compliance with the Green Building Act, meet current DOEE standards, and provide stormwater management to current requirements.

When viewed through a racial equity lens, the proposed PUD is likely to have a neutral impact from an environmental standpoint. OP is not aware of the existing campus' having any negative environmental justice impacts and, with the planned certification at LEED Gold, the two new buildings are not likely to have new negative impacts.

e. Economic Development Element

Policy ED-1.1.1: Core Industries

Continue to support and grow the District's core industries, particularly the federal government; professional, scientific and technical services; religious, grantmaking, civic professional, and similar organizations; postsecondary education; accommodation and food services; health care and social assistance; and administrative support services.
703.12

Policy ED-2.4.1: Institutional Growth

Support growth in the higher education and health care sectors. Recognize the potential of these institutions to provide employment and income opportunities for District residents, and to enhance the District's array of cultural amenities and health care options. 710.4

The campus plan is not inconsistent with the Economic Development Element of the Comprehensive Plan. The revenues developed under the proposed campus plan would allow the school to remain open and continue providing employment and other opportunities to District residents.

A relatively high percent of Wesley students, graduates and employees are non-White and Wesley engages in community outreach and support from both its main campus and its rented

space at Mount Vernon Square. The revenues from the Consolidated PUD would help to keep Wesley financially solvent and able to continue its educational and outreach programs.

f. Parks, Recreation and Open Space Element

With a new playground accessible to the nearby neighborhood and the preservation of 55% of the campus as green open space, the PUD would be not inconsistent with this element.

g. Urban Design Element

The proposed buildings' designs, materials and construction would be sympathetic to the existing mid-century modern building on the campus. The elimination of the surface parking lot would enhance the ambience of what is already a pleasant, walkable campus. The building to be constructed in Stage 1 has been designed to appear as if it were a large residential building, compatible with the nearby residential neighborhood. The Consolidated PUD would be taller and larger than any nearby residences. However, it would be at least 300 feet from the nearest residences. Its materials would be compatible with those of the existing campus building and the surrounding neighborhood.⁵ While proposed plantings would help to screen the building from the neighborhood at certain times of the year, the proposed dormitory would, itself, help to screen the taller, less compatible dormitories at AU from the surrounding neighborhood.

h. Historic Preservation Element

None of the buildings on the Wesley campus have been historically designated or been declared eligible for such designation.

i. Community Services and Facilities Element

The applicant has not indicated the proposal would incorporate any community services or facilities. Given the existing campus, this would be not inconsistent with this element of the Comprehensive Plan.

j. Educational Facilities Element

Policy EDU-3.2.2: Corporate Citizenship

Support continued corporate citizenship among Washington, DC's large institutions, including its colleges, universities, hospitals, private schools, and nonprofits. This should include a continued commitment to high quality architecture and design on local campuses, expanded use of green building methods and low impact development, and the adaptive reuse and preservation of historic buildings. 1213.3

Policy EDU-3.2.4: Universities as Community Partners

Encourage universities to expand service-oriented partnerships that connect students with local communities and that can strengthen town-gown relationships. 1213.5

⁵ The appearance and relationship would be much like that of the Sibley Hospital campus to the adjacent Spring Valley neighborhood.

Policy EDU-3.3.3: Universities as Large Land Owners and Campus Plan Requirements

Continue to require campus plans for colleges and universities located in residential and mixed-use zone districts. These plans should be prepared by the institutions themselves, subject to District review and approval, and should address issues raised by the surrounding communities. Each campus plan should include provisions that respect neighbors and neighboring property and ensure that potentially objectionable impacts such as noise, traffic, number of students, or other similar conditions are addressed. 1214.8

Policy EDU-3.3.4: Student Housing

Encourage the provision of on-campus student housing in order to reduce college and university impacts on the housing stock, especially the affordable housing stock, in adjacent neighborhoods. Consider measures to address the demand for student housing generated by non-District institutions with local branches. 1214.9

Policy EDU-3.3.5: Transportation Impacts of Colleges and Universities

Support ongoing efforts by colleges and universities to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, shuttle service, bicycling, scooters, skateboarding, and other transportation demand management measures. The provision of adequate on-site parking for institutional uses also should be encouraged. 1214.10

The PUD would be not inconsistent with the Education Element of the Comprehensive Plan. The seminary is an open campus, readily accessible to neighbors. The plan proposes expanding this access with a neighborhood-oriented playground. The seminary sponsors an internship program that brings students to work at various non-profit and community organizations throughout the District. Seminary students and graduates assist the mission of many churches in the District.

The Consolidated PUD proposes to decrease the rental pressures that students place on private housing stock by developing dormitory space not only for Wesley students and their families, but also for American University students and their immediate families. These students and their families would otherwise be seeking market rate housing.

When viewed through a racial equity lens it is not clear whether this would have any impact on members of racial or ethnic groups not identifying as White alone. As Table 5 in this report shows, on average in the Rock Creek West planning area, members of these groups – particularly those identifying as Black alone – have lower incomes than the predominant White alone-identifying group in the planning area. Without knowing the projected rent levels for the Consolidated PUD’s new dorm, it is not possible to determine whether the dorm would help to make rents more affordable for members of racial or ethnic minority groups either on or off campus.

As discussed in the transportation element section, while the PUD would expand the absolute number of parking spaces and the ratio of parking spaces to students, the school intends to improve the pedestrian, bicycle, and other means of support for alternative transportation both to campus and on campus. The provision of additional on-campus housing that would serve both Wesley and AU students may ease the transportation burden on students and immediate family members who would otherwise be commuting. This will be addressed further by the District Department of Transportation (DDOT) in a later report, should the PUD be set down.

Should there be any younger school-aged children resident among the immediate family members of the Wesley or AU that would be entitled to reside in the new dorm, they would have easy access to the nearby Janney Elementary, Deale Middle School and Jackson-Reed High School. There is a public library across the street from the Metro station. Medical and wellness facilities would include the Johns Hopkins Sibley Memorial Hospital and urgent care centers in Tenleytown and Friendship heights. Recreation facilities are available at all of the aforementioned private and public schools.

k. Infrastructure Element

The applicant has proposed approximately \$80,000 of improvements to sidewalks and ADA facilities in public space. These should be positive additions, not incompatible with this element of the Comprehensive Plan. As assessed in the campus plan case 22-13, the additional beds and students on the campus would be accommodated by changes in the vehicular circulation plan. The impact of those changes was previously assessed to be acceptable to DDOT in its assessment of the Comprehensive Transportation Report and Transportation Demand Management Plan in the campus plan, subject to specific conditions agreed to by the applicant.

l. Arts and Culture Element

There would be no new buildings or programs relating to this element under the proposal. The PUD should be not inconsistent with this element.

C. Rock Creek West Area Element

Policy RCW-1.1.8: Managing Institutional Land Uses

Institutional land uses in the Rock Creek West Planning Area should be harmonious with surrounding uses, and potential adverse effects on neighboring properties should be minimized when institutions seek expansion. Redevelopment of institutional land should be compatible with the physical character of the community, the changing nature of the District, and not inconsistent with provisions of the Comprehensive Plan and the underlying zoning rules and regulations. Densities and intensities of any future development on such sites should reflect input from the local community, accommodating student housing on campuses and future infrastructure needs. 2308.9

The PUD/campus plan is not inconsistent with the Rock Creek West Area Element. The 1st Stage PUD's scale is consistent with Wesley's development since 1958. The Consolidated PUD is proposing more, and taller, development than in the existing campus plan. However, as

discussed in other sections of this report the proposed construction under both the 1st Stage and the Consolidated PUD should be relatively harmonious with the nearby neighborhood and the adjacent American University.

When viewed through a racial equity lens, the provision of the additional on campus housing may have marginally positive impacts on the rate of increase in the cost of housing in the Rock Creek West area, which would be consistent with the emphasis the area element gives to increasing housing affordability and the income and racial diversity of Rock Creek West residents.

D. Comprehensive Plan Policies with Which the Overall PUD May be Inconsistent Unless Balanced Against Other Elements

The proposed PUD would improve the environmental performance of the campus but not to the maximum extent encouraged by the Comprehensive Plan. The Land Use Element Policy 2.1.4 encourages the retention, rather than the demolition of, existing buildings. The proposal would demolish two dormitories and a small mechanical constructed approximately 60 years ago, as well as a structure formerly used as a residence and then as campus offices. Environmental Element Policy 3.2.2 encourages the construction of Net-Zero buildings. The proposed Consolidated PUD dormitory and the new 1st Stage PUD administrative and mechanical services building would be LEED Gold certified and would not necessarily have solar panels.

Transportation Policy T-1.1.8 also encourages new developments to minimize off-street parking. The proposal would increase the number of parking spaces on the campus from 174 to 394.

The existing building demolition and absence of a Net-Zero rating for the two new buildings is likely to be balanced by the retention and enhancement of the 55% percent of the current open space and its use of best practices for construction and stormwater management. The PUD does not propose an increase in enrollment, faculty or staff at Wesley, nor would it result in any increase in enrollment at the adjacent American University, even though the Consolidated PUD would house AU students. By maintaining existing enrollments while providing more beds on the Wesley campus for Wesley students and adjacent to AU for AU students, the Consolidated PUD would somewhat reduce vehicle trips of students commuting to either campus from more distant residences. The provision of additional parking spaces would help to increase compliance with the prohibition on Wesley or AU-related residential parking permits. However, the applicant should provide additional details on other parking restrictions that would be applied to those not resident on or working on the Wesley campus.

E. The Overall PUD/Campus Plan in Relation to the Comprehensive Plan, As Viewed Through a Racial Equity Lens

1. Overview

The Comprehensive Plan recognizes that advancing equity requires a multifaceted policy approach and that many areas of policy must be brought to bear on the challenge:

Equitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant. Equitable development holistically considers land-use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, health care, technology, workforce development, and employment opportunities. As the District grows and changes, it must do so in a way that encourages choice, not displacement, and builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes and share in the benefits of the growth, while not unduly bearing its negative impacts. 213.7

The Implementation Element calls for “the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis”^{2501.8}. Achieving equity and more specifically racial equity, requires a broad range of policies and tools, some of which fall under the zoning authorities granted to the Zoning Commission and some of which do not. Zoning Commission actions are land use focused, but the broader equity goal includes public policies, budget investments, civic improvements and social services which are beyond the scope of the Zoning Commission.

The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and part of the Commission’s consideration of whether a proposed zoning action is “not inconsistent” with the Comprehensive Plan, rather than a separate determination about a zoning action’s equitable impact.

The scope of evaluation of “all actions through a racial equity lens” varies depending on the type of zoning action before the Commission and what aspects of the outcome the Zoning Commission can control. Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning, where certain priorities stand out. These include affordable housing, displacement, and access to opportunity.

A campus plan is a land use plan and its approval is required when institutional use is proposed in residential zones. This proposed Campus Plan is not inconsistent with the Comprehensive Plan as analyzed through a racial equity lens. The site was essentially undeveloped when purchased by the Seminary in the middle of the last century. At that time its most recent use had been as an experimental station and testing ground for the U.S. Army. The development of the vacant land for Seminary use occurred in 1958-59 and did not involve any displacement of residents.

The Consolidated PUD/Campus Plan would provide housing to Wesley and AU students and their immediate families. It would also provide employment opportunities to District residents, although not necessarily those currently residing in Rock Creek West.

Approximately 34% of the Seminary’s students are Black. 18% of the administration, 25% of the faculty, and 7% of other staff are Black – the second largest racial or ethnic group in the Rock Creek West planning area. (See Table 3). To the extent that current and project Wesley and AU students and their immediate families are or would reside in the District, the proposed expansion of graduate student housing could help to free up residential units containing 569 bedrooms. This should help to marginally relieve demand on the District’s housing supply, marginally slow the rate of increase in rental prices. While this may have some positive impact

on housing affordability for members of racial and ethnic minority groups, given the demographic profile of the Rock Creek West Planning Area, and the composition of the Wesley student body, faculty and other employees, white people are likely to benefit more than any other racial or ethnic group.

However, the revenues Wesley would gain from the new dormitory are projected to stabilize the Seminary's financial future. Given the careers led by Seminary graduates and the outreach the Seminary engages in within the District, the retention of the Seminary may also contribute to racial equity. While some of the student body pursue academic careers, most are trained for careers in service to others. In addition to becoming pastors at congregations such as Shiloh Baptist and Metropolitan Baptist, Ebenezer A.M.E., Foundry Methodist and others, seminary graduates serve as leaders in a range of non-profit organizations. The Seminary actively engages its graduates in virtual and in-person training to advance community engagement skills and provides real time assistance to events promoting racial and social justice, such as the upcoming Poor People's Campaign June 18 march. It also runs an internship program placing Wesley and other theological students as interns in churches throughout the District.

2. Analysis Through the Zoning Commission's Racial Equity Tool

Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning, where the provision of affordable housing, avoiding displacement of existing residents, and creating access to opportunity is a priority. The Commission's Racial Equity Tool outlines information to assist in its evaluation of zoning actions through a racial equity lens. The required information is provided below in relation to the PUD/Campus Plan.

The clearest impact of the proposed PUD when viewed through a racial equity lens is the relative lack of any impact. The proposed PUD/campus plan t would clearly not result in physical displacement of residents as the site does not currently include residential use. The most positive impact may be the continuation of Wesley Seminary as a viable institution. The racially diverse composition of its graduates, student body and employees has been noted elsewhere in this report. It is also possible that the density gained in increased dormitory/residential use on the site may provide an opportunity for additional affordable housing, affordable housing for Wesley and AU students, potentially freeing-up other rental housing for non-student populations.

Planning Area Data

Part 3 of the Racial Equity Tool asks for disaggregated data to assist the Commission in its evaluation of zoning actions through a racial equity lens for the planning area. The data source is the 2012-2016 and 2017-2021 American Community Survey 5 Year Estimates, available via the OP State Data Center ([ACS DATA](#)). Part 3 also asks if the planning area is on track to meet affordable housing goals, and whether the data shows any "intersectionality of factors such as race, ethnicity, age, income, gender, or sexual orientation within the area of the zoning action and how might the zoning action impact the intersection of those factors".

The site is in the Rock Creek West Planning Area, census tract 001004. The ACS Data, Table 1 below, indicates that the area is not experiencing population growth. In 2012-2016, the Planning Area had a population of 91,389 or 13.9% percent of the District-wide total. In the 2017-2021

period, the population decreased slightly to 94,445 and 13.2% percent of the Districtwide total – a 0.5% decrease of the Districtwide total. The median age of the population increased 2.4 years, to 40.6, which is 6.3 years older than the District-wide median.

However, while the population has declined somewhat in the last 5 years, the area has become somewhat more racially and ethnically diverse. For the Planning Area population in 2017-2021, the population identifying as White has decreased 4.8% from the 2012-2016, the population identifying as Black has increased by 1.5%, as Asian by 0.6% and as Hispanic by 0.5%. As with some other planning areas, the largest percent increase, 2.7%, was of persons identified as having two or more races. Nevertheless, White-identifying residents continue to comprise over ¾ of the Planning Area's population.

Table 3: Race or Ethnicity Districtwide and in the Rock Creek West Planning Area (2012-2016 and 2017-2021)

Race or Ethnicity	District-wide 2012-16	District-wide Percent	Planning Area 2012-16	Planning Area Percent	District-wide 2017-21	District-wide Percent	Planning Area 2017-21	Planning Area Percent
Population	659,009	100%	91,389	13.9%	683,154	100%	90,457	13.2%
White alone	266,035	40.4%	73,607	80.5%	276,373	40.5%	68,502	75.7%
Black alone	318,598	48.3%	6745	7.4%	305,109	44.7%	8,045	8.9%
American Indian and Alaskan Native alone	2,174	0.3%	293	0.3%	1,984	0.3%	92	0.1
Asian alone	24,036	3.6%	5,479	6%	27,988	4.1%	5,992	6.6%
Native Hawaiian and Other Pacific Islander alone	271	0.04%	0	0%	359	0.05%	60	0%
Some other race alone	29,650	4.5%	1,552	1.7%	32,484	4.8%	1,690	1.9%
Two or more races	18,245	2.8%	3,622	4%	38,857	5.7%	6,077	6.7%
Hispanic	69,106	10.5%	9,250	10.1%	76,982	11.3%	9,571	10.6%

The 2012-2016 ACS data identify the median household income as \$118,411 for the Planning Area, which was 62% greater than the median Districtwide household income of \$72,935 (See Table 4). There was a significant increase of approximately \$21,000 in the Districtwide median household income for the period 2017-2021. The Planning Area's increase of approximately \$20,000 was generally the same as the District-wide's but, in percentage terms, the increase was less than the District-wide average. represented as smaller percentage increase than the

percentage increase. This may be expected, given the planning area's high-income base and high-level of educational attainment. Almost 88% of residents 25 or older have completed college. The increased income likely contributed to a 1.3% decrease in (housing) cost-burdened households in the planning area and 1.5% decrease in the percent of the population earning below the poverty line. Still, at 7.5%, the poverty level is surprisingly high for a planning area with such a high median household income level.

Table 4: General Characteristics Districtwide and in the Rock Creek West Planning Area (2012-2016 and 2017-2021) 9

Characteristic	Districtwide 2012-2016	Planning Area 2012-2016	Districtwide (2017-2021)	Planning Area (2017-2021)
Population	659,009	90,457	683,154	90,457
Median Household Income	\$72,935	\$118,411	\$93,547	\$138,665
Completed College (age ≥ 25 yrs.)	55.4%	86.2%	61.4%	87.9%
Median Age	37.7	38.2	34.3	40.6
Unemployment Rate	8.7%	3.5%	7.1%	3.9%
Cost Burdened Households	38.6%	31.1%	36.1%	29.8%
Below Poverty Level	17.9%	9%	15.4%	7.5%

Table 5, below ,shows the disaggregated data in 2017-2012 period by race, Districtwide and in the Rock Creek West Planning Area.

Table 5: General Characteristics Disaggregated Districtwide and in the Rock Creek West Planning Area (2017-2021)

	Population	Median Income	Unemployment Rate	Owner Occupied	Renter Occupied	Housing Cost Burdened	Below Poverty Line
DISTRICT TOTAL	683,154	\$93,547	7.1%	41.5%	58.5%	36.1%	15.4%
Rock Creek West Planning Area TOTAL	90,457	\$138,665	3.9%	53.5%	46.5%	29.8%	7.5%
White Alone	68,502	\$159,110	3.6%	57.7%	42.3%	n/a	4.9%
Black or African American Alone	8,045	\$63,653	8.9%	30.4%	69.6%	n/a	25.7%
American Indian & Alaska Native	92	\$42,500	0%	0%	0%	n/a.	0%
Asian Alone	5,992	\$107,935	7.7%	44.8%	55.2%	n/a	14.9%

	Population	Median Income	Unemployment Rate	Owner Occupied	Renter Occupied	Housing Cost Burdened	Below Poverty Line
Native Hawaiian & Other Pacific Islander	60	\$137,500	27.8%	100	0%	n/a	16.7%
Other Race	1,690	\$79,113	1.1%	28.6%	71.4%	n/a	9.7%
Two or More Races	6,077	\$105,150	3.8%	46.7%	53.3%	n/a	6.3%
Hispanic or Latino*	9,571	\$121,720	3.6%	50.8%	49.2%	n/a	6.0%

The information in Table 5 shows that Black or African American Alone have the second-lowest median income in the Planning Area. At a median of \$63,635 for Black or African American alone-identifying households, this is approximately \$55,000 less than the median income for White-identifying households.

This gap may also be reflected in the significantly lower percentage of Black or African American Alone-identifying households that own their place of residence (30.4% versus those renting their place of residence (69.6%). This is significantly different than the percentage of White Alone-identifying households in the planning area that own their place of residence (59.8%) rather than renting (40.2%). While the proposed PUD/Campus plan may reduce some of the off-campus rental demand from Wesley and AU students, it would not likely affect the percentage of owner-occupied versus renter occupied housing units.

Table 6: Owner and Renter Occupied Households Districtwide and in the Rock Creek West Planning Area (2012-2016 and 2017-2021)

Tenancy	District wide 2012-2016	District wide Percent	Planning Area 2012-2016	Planning Area Percent	District wide 2017-2021	District wide Percent	Planning Area	Planning Area Percent
Owner Households	112,672	40.7%	22,641	45.9%	128,720	41.5%	22,308	53.5%
Renter Households	163,874	59.3%	18,449	55.1%	181,384	58.5%	19,400	46.5%
Total Households	276,546	100%	41,090	100%	310,104	100%	41,708	100%

The rising cost of housing in the District limits the ability to provide housing for a variety of household types, including family, senior housing, rental and ownership housing, and housing for all income levels. Given the land use characteristics of the District, only a small amount of the total land area (28.1 percent) is dedicated to residential use (205.3). Scarcity of land increases the cost of new housing, limits the availability of housing, and intensifies housing cost burdens, particularly for lower- and middle-income households. The Comprehensive Plan states that “*residents of color are a majority of lower-income households in the District and, therefore, face a disproportionate share of the problems caused by housing insecurity and displacement*” (206.4).

The Comprehensive Plan recognizes that without increased housing the imbalance between supply and demand will drive up housing prices in a way that creates challenges for many residents, particularly low-income residents. The Consolidated PUD's proposed dormitory would free-up off-campus rental units for non-student renters. The Comprehensive Plan further recognizes the importance of inclusionary zoning requirements in providing affordable housing opportunities for households of varying income levels. As constructed as part of a PUD rather than a campus plan, the proposed new dormitory would clearly be subject to Inclusionary Zoning. This requirement for IZ was more problematical when the dormitory was proposed solely as part of a campus plan.

Applying the lens of racial equity to zoning actions would target support to communities of color. The Comprehensive Plan states that *“residents of color are a majority of lower income households in the District and therefore face a disproportionate share of problems caused by housing insecurity and displacement. (206.4).*

Table 7, below, excerpted from the Mayor's January 2023 DC's Comeback Plan, p. 22, indicates that the Rock Creek West planning area is, by far, more distant from achieving the Mayor's 2025 affordable housing goal than any other planning area. It is possible that the proposed changes to the student housing capacity on the Wesley campus may at least help the planning area to not slip farther behind compared to other planning areas.

Table 7

Table 1: 2025 Dedicated Affordable Housing Production Goals and Projections by Planning Areas (Projections as of December 2022)

Planning Area	Affordable Unit Goal	Percent of Progress Towards Goal (January 2023)	Projected Percent of Goal by 2025
Far Southeast & Southwest	1,120	182.2%	369.50%
Far Northeast & Southeast	490	208.2%	322.40%
Lower Anacostia Waterfront & Near Southwest	850	51.6%	161.30%
Mid-City	1,010	51.9%	131.80%
Upper Northeast	1,350	53.4%	97.20%
Central Washington	1,040	44.9%	94.60%
Rock Creek East	1,500	57.9%	84.40%
Near Northwest	1,250	10.7%	37.20%
Capitol Hill	1,400	14.9%	34.60%
Rock Creek West	1,990	3.6%	13.80%
Total	12,000	54.1%	110.00%

Table 8: Vulnerable or Special Populations in the Planning Area and District

Characteristic	Districtwide 2012-2016	Planning Area 2012-2016	Districtwide 2017-2021	Planning Area 2017-2021
Persons 65 or Older	11.4%	16.9%	12.2%	19.5%
Persons Under 18 Years	17.4%	16.7%	17.5%	17.1%
Disability Rate	11.3%	5.7%	11.2%	7.7%

Table 8 shows that the percentage of persons 65 years or older in the planning area is about 8% higher than the Districtwide percentage. However, persons under 18 years in the planning area is generally the same as the Districtwide percentage. It is possible that in a planning area with an above average percentage of over-65 residents, the presence of universities may contribute to the percentage of younger population remaining generally the same as the District-wide average. Although perhaps a misnomer, the disability rate Districtwide has remained fairly constant while that of the Planning Area continues to be lower than the Districtwide rate .

Community Outreach and Engagement

The applicant has been engaging with the community since its initial campus plan in 2005. The engagement for the currently proposed PUD effectively began in 2019, in preparation for what became the Z.C. 22-13 campus plan proposal. Involved groups have included ANCs 3D and 3E, a Community Liaison Committee established under the campus plan process and neighborhood civic groups such as the Spring Valley-Wesley Heights Citizens Association. The applicant lists 27 such meetings in Exhibit 3A3, and the changes to plans that resulted from them.

The previous campus plan proposal, which is essentially the same as the currently proposed PUD, was not without opposition. The Neighbors for a Livable Community and the Spring-Valley-Wesley Heights Citizens Association expressed concern about the scale of the dormitory now proposed as the Consolidated PUD and the absence of coordination between Wesley and AU on a dormitory on the Wesley campus that would house significantly more students from AU than from Wesley. Comments from the Committee of 100 on the Federal City echoed some of the concerns and particularly focused on the relationship of IZ applicability and requirements to the proposed dormitory.

Past Racial Discrimination

Racial covenants in neighborhoods near the Wesley campus persisted into the 1960's. OP does not have data showing any discrimination at this site. Wesley has been active in racial and social justice outreach programs and in educating graduates who minister to minority communities. The Seminary's students and staff are more racially diverse than the nearby residential areas. Currently, approximately 34% of Wesley's students identify as Black as do 18% of the administration, 25% of the faculty, and 7% of other staff.

Zoning Commission Evaluation Factors

According to the Racial Equity Tool, the Commission will use the following criteria, themes and questions, along with data provided in its evaluation of a zoning action's consistency with the Comprehensive Plan, as viewed through a racial equity lens. As demonstrated above, the proposed map amendment would advance many of the policies related to racial equity in the provision of housing, job creation, the advancement of arts and culture and assist in the revitalization of an underserved area.

The table below addresses themes/questions based on Comprehensive Plan policies related to racial equity, that are anticipated to have positive or negative impacts and/or outcomes as a result of the proposed map amendment.

Factor	Question	OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The PUD would not result in displacements of residents, per se. The site is an educational campus. There are no permanent residents. While 45 student beds would be temporarily lost during construction of the Consolidated PUD, the number of beds on-campus would be significantly increased by the Consolidated PUD.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	OP does not anticipate indirect displacement as a result of this zoning action.
Housing	Will the action result in changes to: <ul style="list-style-type: none"> ▪ Market Rate Housing ▪ Affordable Housing ▪ Replacement Housing 	The map amendment would allow the provision of 536 additional beds on the Wesley campus, with 53-66 of them being reserved for Inclusionary Zoning units. The provision of more student beds by the Consolidated PUD may have a marginally positive impact on the affordability of housing in Rock Creek West by freeing up market rate units now rented by students who may relocate to the Wesley campus. In general, the provision of market rate and affordable housing should help to ease upward pressure on housing costs in the vicinity.
Physical	Will the action result in changes to the physical environment such as: <ul style="list-style-type: none"> ▪ Public Space Improvements ▪ Infrastructure Improvements ▪ Arts and Culture ▪ Environmental Changes ▪ Streetscape Improvements 	The action would result in improvements to the transportation infrastructure along Massachusetts Avenue and add recreational opportunities through the construction of a new neighborhood-oriented playground on the campus. .
Access to accessi	Is there a change in access to opportunity? <ul style="list-style-type: none"> ▪ Job Training/Creation ▪ Healthcare ▪ Addition of Retail/Access to New Services 	The zoning action would lead to a temporary increase in construction jobs and a permanent increase in jobs to supply and manage the new Consolidated PUD dorm. .

Community	<p>How did community outreach and engagement inform/change the zoning action?</p> <p>▪ (e.g., did the architectural plans change, or were other substantive changes made to the zoning action in response to community input/priorities etc.?)</p>	<p>The transportation management plan was amended to restrict traffic entering and exiting from the residentially bordered University Avenue. Residential parking permits were prohibited for all Wesley students and for AU students and immediate family members residing in the proposed Consolidated PUD dorm. The designs for the upper stories of that dorm were set-back farther from the residential neighborhood and their layout was changed to avoid light spillage towards the neighborhood. The community-accessible playground was added and the previously proposed retail space in the Consolidated PUD was eliminated. The applicant states that the ratio of beds to parking spaces in the Consolidated PUD dorm was reduced and that the Seminary agreed to keep the existing cap on student enrollment.</p>
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F. Summary of Planning Context Analysis

As demonstrated above, on balance the proposed map amendment would not be inconsistent with the recommendations of the FLUM for institutional use and with the Policy Map's designation of the surrounding area for neighborhood conservation. Additionally, neither the 1st Stage PUD nor the Consolidated PUD would be not inconsistent with many of the policies and actions of the Citywide Elements and the specific recommendations for the Rock Creek West Area Element. The development would advance equity consistent with the Comprehensive Plan and the Area Element. OP therefore recommends that the Zoning Commission set down the proposed 1st Stage PUD and the Consolidated PUD.

V. SUMMARY OF COMPLIANCE WITH PUD REGULATIONS

Given the proposed increase in the percent of non-Wesley students that would be permitted to live on the Wesley campus, a PUD is an appropriate vehicle for establishing conditions to ensure the dormitory could not morph into the type of general residence that is not permitted in a campus plan and whose proposed height would be permitted only under Subtitle F § 203.3's permissions for an institutional building.

The 8.7-acre size exceeds the 1-acre minimum site size requirements of Subtitle X § 301.1. The 1.07 FAR would be within the maximum limit for both a by-right project with IZ in the RA-1 zone and for a PUD in the zone. With the exception of a relatively small portion of the proposed Consolidated PUD dormitory, the 75-foot 8-inch maximum height of the Consolidated PUD would be within the limits of the RA-1 zone. As discussed in this report, relief for the property line setback related to the height would be justified.

In balance, the PUD would be not inconsistent with the Comprehensive Plan, including when viewed through a racial equity lens.

The architectural design of the PUD would be consistent with the existing campus and the architectural vocabulary and materials would be compatible with those of the surrounding neighborhood. While the Consolidated PUD would be taller than any building now on the campus, the applicant has taken care to set-back its upper stories from the surrounding neighborhood and to provide for landscaping to help screen it from nearby residential areas.